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NATIONAL CENTRAL PHARMACY

June 29, 2000

RSPA-99-6283-31

TO: Docket Management System  
US Department of Transportation  
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Washington, DC 20590-0001

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From: Michael J. Wood  
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Re: RSPA-99-6283

I would like to take this opportunity to respond and comment on the proposed changes to the DOT regulations as to the extent they would affect operations at the local level in nuclear medicine. Although I can be sympathetic to an attempt to harmonize regulations with international regulations, our staff agrees that said proposals would be very detrimental to the daily operation of a nuclear pharmacy without any benefit at all to the safety of our employees, our patients, or the public in general. As you are aware, requiring a CDL for all persons transporting any labeled package would be a significant change in operating procedures with significant increases in cost of operation for the nuclear pharmacy. Not only would increase in operating expenses, training, and monitoring of delivery personnel be involved, but it could also affect the prompt delivery of emergency doses to hospitals in need of emergency medications. As a driver with a commercial drivers license would have to be located to deliver the dose. In that the nuclear pharmacy delivers low level W-I and Y-II RAM packages on a 24 hour a day basis, any delay in delivery could put the patient at risk. Without any apparent improvement in safety to the public, employees, or patients, I would hope that these regulations will not be implemented to include the practice of nuclear medicine at the local level.

Sincerely,

Michael J. Wood, RPH  
National Central Pharmacy

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